

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: Gloria P. Johnson and Aaron P. Warren :

Debtors

:

CHAPTER 13

:

US Bank Trust National Association, :

As Trustee of the Cabana Series III Trust :

Movant

:

Case No. 16-13900-AMC

v.

:

Hearing Date: 02-27-2020 at 11:00 am

:

Gloria P. Johnson and Aaron P. Warren :

11 U.S.C. 362

Respondents

:

:

ANSWER TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY

And now Gloria P. Johnson and Aaron P. Warren, by their attorney, Stephen M. Dunne,

Esquire answers the request for relief from the automatic stay and avers as follows:

1. Denied.
2. Admitted.
3. Admitted.
4. Denied.
5. Denied.
6. Denied.
7. Denied.
8. Admitted.
9. Denied. Debtors have made all payments since March 2019 to present pursuant

to the terms of the note and mortgage as evidenced by the attached TD Bank & Police and Fire

Federal Credit Union bank statements dated March 2019 through February 2020. See Ex. A-K.

Date	Amount	Method of Payment	Confirmation Number	Bank Statement
March 6, 2019	\$458.06	Telephonic Payment	146154831	TD Bank
April 3, 2019	\$458.06	Telephonic Payment	146154831	Police and Fire Federal Credit Union
May 7, 2019	\$458.06	Telephonic Payment	146154831	TD Bank
June 12, 2019	\$458.06	Telephonic Payment	146154831	TD Bank
July 10, 2019	\$458.06	Telephonic Payment	146154831	TD Bank
August 8, 2019	\$458.06 *	Telephonic Payment	146154831	TD Bank
September 17, 2019	\$430.13 *	Telephonic Payment	146154831	TD Bank
October 9, 2019	\$430.13 *	Telephonic Payment	146154831	TD Bank
November 13, 2019	\$430.13 *	Telephonic Payment	146154831	TD Bank
December 13, 2019	\$430.13 *	Telephonic Payment	146154831	TD Bank
February 4, 2020	\$430.13 *	Telephonic Payment	146154831	TD Bank

Notice of Mortgage Payment Change filed 07/11/19 effective 08/01/19 - \$430.13

10. Denied. Debtors made all payments pursuant to the note and mortgage.
11. Denied.
12. Denied.
13. Denied.

WHEREFORE, debtor requests that the motion for relief from the automatic stay be denied.

Respectfully submitted,
Stephen M. Dunne, Esquire
/s/ Stephen M. Dunne
1515 Market Street, Suite 1200
Philadelphia, PA 19102